

FILED 09 MAY '25 10:49 USDC-ORF

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND OREGON

FRANKLIN RAMIREZ NAVARRETE

CASE NO. 3:25-cv-805-MC

Plaintiff

V.

**VIOLATION THE CONSTITUTIONAL
PRISONERS MEDICAL RIGHTS 6.3
& HIS DETENTION CAUSE**

**GEO CORPORATION BRUCE SCOTT
AND US IMMIGRATION CUSTOM
ENFORCEMENT JEFF WHITE**

Defendant

COMPLAINT

Plaintiff alleges as follows

1|VIOLATION THE CONSTITUTIONAL PRISONERS MEDICAL RIGHTS 6.3

JURISDICTION

The court has Jurisdiction under the civil law of the United States of America.

STATEMENT OF FACTS AND CLAIM OF RELIEF

Plaintiff seeks the court's leave to proceed in forma pauperis, and for appointment of counsel to assist him in his claim. Mr. Ramirez is proceeding as a pro se with a help from another person at the NW ICE processing center, Mr. Ramirez has been detained by US immigration custom enforcement on March.18.2025 for non clear reasons while he was interviewed by the immigration custom enforcement on March,4,2025, the immigration officer did not mention to Mr. Ramirez any concerns for his litigation at the ninth circuit while Mr. Ramirez has pending application at the United States Citizenship and Immigration Services for U-Visa application which he filed on 2020, Mr. Ramirez bringing this claim under the constitutional prisoners medical right 6.3, Mr. Ramirez is not a fluent in English language he has a help from another person at the detention center to file his claim, he has medical issue under asthma which he need a sleep Apnea C-PAP machine to help him to sleep normally and he is taking schizophrenia medication, Mr. Ramirez since he has been arrested at Portland, Oregon office at the time of his interview

he has been moved to the NW ICE detention center, he has been asking since March, 18,2025 (kite – Mr. Ramirez request April,11,2025 EX.A)for his medication C-PAP machine and his lost dentures that was not provided by the dental clinic at ICE facility, on April,25,2025 the medical department at the NW ICE processing center respond back to Mr. Ramirez through GEO officer that he needs to provide his own C-PAP EX.A (see ICE respond)machine if he wants not to die at this place as he needs to provide his own denture too and they will allow him to pay for it and delivered to his pod see EX.A (ICE respond) and Mr.Tareq Zakarneh declaration EX.A , now it comes to the record that the US immigration custom enforcement and his custodian violate his constitutional rights to make him suffer and die or surrender his rights and sign a deportations paper in favor of the US government, the thirteenth amendment prohibit this action which it comes under a slavery action which its prohibited according to the federal law and considered a human trafficking action, for justice require I'm asking the federal court a relief for pain and suffer and a compensating damage while I'm entitled to compensation for the case Nwauzor V. GEO corporation and ICE Grp.,127 F.4th 750 case # 3-17-cv-05806-RJB and ICE case # 3-17-05769-RJB and now its in front of eleven Judges at the ninth circuit case # 21-36025, as Fraihat V. GEO ninth circuit case# 20-55634 and case # at the district court of California EDCV 19-1546 - JGB.

As no reason for Immigration and Custom enforcement to keep him in custody while he has a pending application for U visa with USCIS at Phoenix, AZ center with receipt # I918 – LIN2031950757 as my family filed a pardon application for my health conditions and the hardship life for any conviction or that has been

attached to my name by default by mistake receipt # I192- LIN2031950770, no reason for ICE and DHS to keep me in custody while he has seven American daughters and he support his daughter Stephanie who has one disable son Christian and she lives with Mr. Ramirez house and his wife who she is a green card holder who has been with her for the last 35 years with a domestic partnership for the state of Oregon, Mr. Ramirez feels that he has been discriminated because he is part of two law suits against the Immigration custom enforcement and their contractor GEO corporation.

Mr. Ramirez Prayers to the court to grant him the relief that is fair for him and his family while he has been at the state for the last 35 years, as Mr. Ramirez still in immigration proceeding with the USCIS either if the ninth circuit denying his petition for review of his asylum application, for his age and his health condition he should be with his family and his grand kids of his daughter Stephanie who is her husband Mr. Cruz-Pat is disable and is housed in a nursing home now, the DHS represented by ICE did not take in considerations all of these factors for Mr. Ramirez unfortunately and just ask him to sign the deportation papers without giving him any chance that he is waiting for and let him exhaust his due process until if he his application of U – Visa has been denied he should be able to go through a hearing in front of the immigration judge , as they use his medical conditions against him , Mr. Ramirez has the right to stay in the state under public law 106-386, Section 701(c)(1) (C) for period of time while he is in immigration proceeding as his medical conditions and family circumstances must be taken in consideration.

DATED this 28th day of April, 2025.

/s/ Franklin Ramirez
Franklin Ramirez, Plaintiff

EX.A

Declaration of Tareq Zakarneh

I Tareq Zakarneh declare under penalty and perjury that I witnessed the discrimination incident against Mr. Franklin Navarrete- Ramirez for his medical conditions when he asked for C-PAP machine at the NW ICE processing center and I saw the respond from the Medical department at ICE processing center has been brought to him by GEO officer, as asking him to provide his own C-PAP machine to save his life, which it so prejudice versus this sick man who is a supporter for his family working in hard jobs to keep his family under one roof with his wife and his daughter Stephanie and her disabled son and her disabled husband with her four kids, as I was responsible to fill for him the kite request to make the medical at ICE facility to provide him with a C-PAP machine, as I witnessed that the response was go to sick call without any further help than an inhaler that has been provided to him for emergency use, later on on April, 25.2025 the US Immigration custom enforcement request Mr. Ramirez to make his family send him his own C-PAP machine on his own cost as I witnessed the respond from ICE medical department at the day when I was sitting with Mr.Ramirez watching the TV as I informed him that this is a medical violation of his rights, If I will be asked to testify in front of any court that has been held for this matter I will be ready to do it for the interest of Justice require.

/s/ Tareq Zakarneh
Eng.Tareq Zakarneh
NW ICE processing center
1623 East. J street
Tacoma, WA 98421

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U.S. Immigration and Customs Enforcement

Special Needs Form

PATIENT NAME: RAMIREZ
NAVARETTE, FRANKLIN

FACILITY: NW ICE
Processing Ctr

A: 094895301

SubID: 398232570

I have reviewed the patient's record and I have found that patient will need the following Special Needs/Special Requirements

1. Equipment : Please allow detainee to have other item sent to them, in accordance with facility policy (04/25/2025 - 05/31/2025)

C-PAP machine

Electronically
signed by:

Choi NP,
Byungyong
04/25/2025
09:14

Print
Name/Date/Time

[Handwritten Signature] FM

Patient



U.S. Immigration and Customs Enforcement

Special Needs Form

1

PATIENT NAME: RAMIREZ
NAVARETTE, FRANKLIN

FACILITY: NW ICE
Processing Ctr

A: 094895301

SubID: 398232570

I have reviewed the patient's record and I have found that patient will need the following Special Needs/Special Requirements

1. Equipment : Other: (04/16/2025 - 04/16/2026) **MAXILLARY DENTURE**

The dental department MUST evaluate denture prior to delivering it to ALIEN

[Signature]
CAPT Lucia H. Nascimento, DDS
04/16/2025

Electronically
signed by:

Nascimento
DDS, Lucia H
04/16/2025
06:06

Print
Name/Date/Time

Fran

NW ICE Processing Center
1623 East J Street
Tacoma, WA 98421



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FIRST-CLASS MAIL

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WED 07 MAY 2025 PM

To: US District Court
Clerks Office
1000 SW 3rd Ave #740
Portland Oregon 97204

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